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Ref: 8HWM-FF

Mr. Richard Schassburger
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: OU2 Draft SVE Pilot Test Plan, Site No. 2, East Trenches

Dear Mr. Schassburger:

EPA has reviewed the above referenced document and has the following comments. With the exception of text that pertains to the proposed electrical heating system, this document repeats, in less detail and clarity, the January 1993 submittal, entitled Final Pilot Test Plan, Soil Vapor Extraction Technology, Subsurface IM/IRA, OU 2. Better reference to the January 1993 document should have been made, so that this plan would only discuss specific changes and previously unincorporated information. Listed below are specific topics and graphics that must be included in the final test plan so that the optimal placement and testing of SVE technology at Rocky Flats is achieved.

Very little reference is made to Site no. 1, (IHSS 110), and the influence that results from it may have on Site No. 2, (IHSS 111.1). Since these sites are only about three hundred feet apart, consideration should be given to using the first site to also perform the electrical heating pilot tests. To rationalize the time and expense of implementing two pilot test sites so near to each other, the differences between each site should be specified and the expected benefit should be discussed.

As stated in this and other documents, the success of soil vapor extraction is highly dependent on the permeability of the medium involved. For this reason, it is necessary to more clearly understand and portray the geology and contaminants of the site by using the wealth of geotechnical and soil vapor survey data that is available from past and ongoing investigations in this area. By constructing detailed lithologic cross-sections and subsurface maps this system can be optimally located in zones of sufficient permeability and proximity to contaminants. Such diagrams must include the proposed depth and placement of injection and extraction wells, probes, inlets, and heating elements. Of course, the importance of accurately logging all geologic materials and contaminants encountered while

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installing wells must not be forgotten for meaningful interpretation of the results.

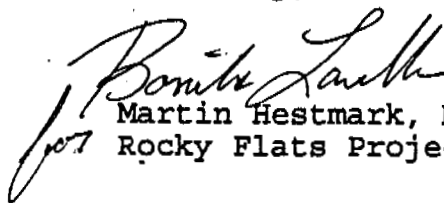
Page 1-6 of this document states that sandstone and claystone will be used interchangeably in the document following section 2.0. Since these rock types typically have greatly different permeabilities, such use of terminology in the test plan is unacceptable and detrimental to the project. Therefore, when the type of bedrock has some importance, the rock type must be correctly specified as sandstone or claystone. If the rock type has no importance, it should be referred to as bedrock.

EPA's approval letter dated February 11, 1993, regarding the January 1993 Final Test Plan, specifically states that a determination must be made regarding the viability of using the South Walnut Creek Treatment Plant to treat contaminated ground water extracted during the SVE testing. This matter was not addressed in the test plan for Site No. 2 and must be resolved and documented in writing prior to submittal of the final test plan for Site No. 2.

Since many aspects of this test plan are dependent on the soil vapor survey results and the results of pilot test site no. 1, these projects must be incorporated into the schedule presented in the test plan.

If you have any questions regarding these matters, please call Gary Kleeman of my staff at 294-1071.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

cc: Scott Grace, DOE
Eric Dille, EG&G
Michael Klein, EG&G
Terry Smith, PRC